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The 200th anniversary of Yale finds the Law School happily situated, both as to progress and promise within its own halls and in the halls and councils of the University. Co-incident with the Bicentennial observances marking the development of Yale, the Law School presents one of the finest and most admirably equipped halls in the University, the largest enrollment in its history, and a record in the development of American law which must be received with gratification by those to whom Yale generally, and Yale Law School particularly, means so much.

It is at this significant point in the history of the Law School that the new Board of Editors assumes its duties. We look forward to the Bicentennial of the Law School.

The Board of Editors, after labors begun last June and carried on through the summer months, experiences no little satisfaction in publishing a chronological bibliography of the legal and political works of Yale Law School men. This is the first compilation of the

kind, there being no such record in existence. Two circulars were mailed to every address in the Yale Law School Alumni Record (1824-1899) up to and including 1895. The second circular was necessary because of the dilatory responses of many of the alumni.

This bibliography contains no newspaper articles and only the opinions of United States judges, and State judges in courts of last resort, were noted.

In this arduous work the Board is indebted to the Hon. Simeon E. Baldwin for his inspiration, his article, and also for helpful data.

From the standpoint of bench and bar the most important contribution to the Bicentennial of Yale is the valuable work just published in which the development of law in its several branches is historically treated by the members of the Law School Faculty.

The volume is entitled "Two Centuries' Growth of American Law," and is one of the notable series designed to perpetuate in book form all that is symbolized in the Bicentennial. A glance at the contents reveals its importance:

Simeon E. Baldwin: Constitutional Law; Pleadings in Civil Actions; Private Corporations.

George E. Beers: Real Property.

Leonard M. Daggett: Wills.

William Frederic Foster: Contract.

Edwin B. Gager: Equity, Mortgages of Real Property.

Henry Wade Rogers: Municipal Corporations.

David Torrance: Evidence.

William K. Townsend: Admiralty, Copyrights, Patents, Trade-marks and Unfair Trade.

George D. Watrous: Torts.

James H. Webb: Criminal Law and Procedure.

Theodore S. Woolsey: International Law.

The W. L. Storrs lecturer of the year was Kazuo Hatoyama, D. C. L., LL.D., who took as his subject "The Civil Code of Japan." Dr. Hatoyama was formerly Speaker of the Japan House of Representatives and is now the honored President of the Tokyo Semmon Gakko, an institution which annually sends a number of students to this University. While he was a student here Yale marked him as a man of great promise, and recently rendered a verdict of "well done" by the bestowal of a merited LL.D. during the Bicentennial exercises.

We take pleasure in announcing that at a recent meeting the following men were elected to the Board: J. F. Malley, '02; J. A. Turner, '03; C. W. Bronson, '03; and Franklin Carter, Jr., '03, assistant business manager.

COMMENT.

THE RIGHT TO PRIVACY.

Probably no branch of the law can show a greater development during the last century than the law of privacy. From a strict adherence to the rule that a court of equity will not grant an injunction except where property rights are affected, courts of equity have in the last few years expressly recognized "the right to be alone," independently of any property considerations.

At common law no remedy existed for a violation of one's privacy, no damages being predicable of mere mental disquietude.

The right of privacy in the enjoyment of real property has never been questioned. Of other kinds of property, the right was first recognized in the case of private letters, and was based upon a property interest in them. Afterwards the court enjoined the unauthorized use of a name, and finally a wrong to one's personality. Originally a court of equity would not interfere where an action for damages could not be brought, *Southey* v. *Sherwood,* 2 Mer. 437. (1817). In the case of *Gee* v. *Pritchard,* 2 Swanst. 402, a step in departure from the strict property qualifications was taken. Relief was held obtainable to restrain the violation of a personal legal right which could be cognizable as property. The same theory was advanced in *Prince Albert* v. *Strange,* 1 Mac. & G. 25. (1849), where Lord Cottenham repudiated the notion that an injunction could not be granted unless an action would lie. All that was necessary to found the jurisdiction of the court was held to be a direct clear interference with a right clearly connected with property. Finally in the case of *Pollard* v. *Photographic Company,* 40 Ch. D. 354 (1889), the court entirely receded from the old idea that a violation of property rights was necessary to the granting of relief. It was held that the right to grant an injunction does not depend in any way upon the existence of property, "nor is it," said the court, "worth while to consider carefully the grounds upon which the old